

Proceeding: **IN THE MATTER OF TELECOMMUNICATIONS RELAY SERVICES AND SPE** Record 2 of 2
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3049 Noriega Street
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Dear Ms. Nguyen,

I have a colleague whom I really respect. His name is Dr. Bob Segalman whom I know you have heard from because he has championed Speech-to-Speech to help an important segment of American citizens with disabilities. I feel especially close to Dr. Segalman because my own mother was severely hearing impaired until she was 52 years of age when a new surgical technique restored much of her hearing loss. I know how much she would have been in favor of helping people who have difficulty communicating in speech avail themselves of the new communications technology to improve their lives. Since January 15, 1998, I have been doing a study of a very debilitating disease. Through my research, I have met many intelligent, productive citizens whose quality of life has been improved through the various new technological devices, one of which is Speech-to-Speech.

Based on these life experiences, I support the Federal Communications Commission's (FCC) tentative conclusion that STS (Speech-to-Speech) be required nationally. Its cost should not prevent establishing a national requirement. STS is an inexpensive service. The cost of Speech-to-Speech plus outreach for California for 1997 was less than \$1m. As California is the most expensive state, all other states should expect lower cost. Some costs will be much lower. The state administrators who questioned making STS a national requirement because of unknown costs may have not been aware of the California costs at the time. Regardless of the cost, I believe it is an ethical act to improve the lives of the many people Speech-to-Speech helps.

I support the FCC's tentative conclusion that the costs of providing interstate STS should be reimbursed from the interstate Telecommunications Relay Service (TRS) Fund. This conclusion is based on, and consistent with, the statutory duty not to discourage the implementation of improved TRS.⁵ While STS may have operational differences that make compliance with all current Commission standards for tty relay infeasible, a panel of consumers and providers should be convened to determine the appropriateness of compliance with each standard.⁶ The STS standards should deviate from those of TRS in the definition of confidentiality. While general confidentiality is vital, confidentiality should not be defined as specifically for STS as for TTY relay. The FCC could convene such a consumer board to study this issue.

I am sure that you are familiar with the many other important legal and technical points surrounding this issue, and I will not repeat them in my letter. I have chosen those arguments that strike me as being the most cogent in support of Speech-to-Speech. Nevertheless, I support the general statement advocated by Dr. Bob Segalman and other STS advocates.

Cordially yours,

J. Barry Gurdin Ph.D
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